1	ADAM PAUL LAXALT Attorney General Heidi Parry Stern (Bar. No. 8873) Chief Deputy Attorney General	
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3	State of Nevada Office of the Attorney General	
4	555 E. Washington Ave., #3900 Las Vegas, NV 89101-1068	
5	(702) 486-3594 (phone) (702) 486-2377 (fax)	
6	hstern@ag.nv.gov	
7	Attorneys for Respondents	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	JULIUS BRADFORD,	Case No. 2:13-cv-01784-RFB-GWF
11	Petitioner,	MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO SECOND AMENDED
12	VS.	PETITION FOR WRIT OF HABEAS CORPUS
13	WILLIAM GITTERE, et al.	(ECF NO. 67)
14	Respondents.	(THIRD REQUEST)
15		
16		
17	Respondents hereby request an extension of time of 90 days, up to and including February 7,	
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18		on of time of 90 days, up to and including February 7, oner Julius Bradford's Second Amended Petition for Writ
	2019, within which to file their answer to Petitio	
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DECLARATION OF HEIDI PARRY STERN

STATE OF NEVADA COUNTY OF CLARK)

I, HEIDI PARRY STERN, being first duly sworn under oath, depose and state as follows:

- I am an attorney licensed to practice law in the State of Nevada; qualified and admitted to 1. practice before this Court; employed as a Chief Deputy Attorney General in the Office of the Nevada Attorney General; and pursuant to this employment, I have been assigned to represent Respondents in Julius Bradford v. Timothy Filson, et al., 2:13-cv-01784-RFB-GWF, and as such, have personal knowledge of the matters contained herein.
- 2. This extension is necessary due to my preparation for oral argument in the Ninth Circuit in Robert Jones v. Jack Palmer, et al., Case No. 17-15575, which took place on October 9, 2018, and Alquandre H. Turner v. Renee Baker, Warden, et al., Case No. 17-72044, which will be taking place on November 16, 2018.
- 3. In addition, our office has been short staffed over the past few months due to the retirement of one of the attorneys in our unit and the difficulty in finding a replacement for him.
 - 4. That the answer is currently due to be filed on November 9, 2018.
 - 5. Respondents request 90 days to file their answer, up to and including February 7, 2019.
 - 6. I have contacted opposing counsel, and he has no objection to this request for extension.
- 7. This is Respondents' third motion for extension of time to file their answer to the Second Amended Petition for Writ of Habeas Corpus.
 - 8. This motion for extension of time is made in good faith and not for the purpose of delay. FURTHER DECLARANT SAYETH NAUGHT.

DATED: this 9th day of November, 2018

IT IS SO ORDERED:

/s/ Heidi Parrv Stern Heidi Parry Stern (Bar No. 8873) Chief Deputy Attorney General

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RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE

DATED this 14th day of November, 2018.

CERTIFICATE OF SERVICE I hereby certify that I electronically filed the foregoing Motion for Extension of Time to File Answer to Second Amended Petition for Writ of Habeas Corpus (ECF No. 67) (Third Request) with the Clerk of the Court by using the CM/ECF system on November 9, 2018. The following participants in this case are registered electronic filing systems users and will be served electronically: Jeremy Baron, Esq. Megan Hoffman, Esq. Office of the Federal Public Defender 411 East Bonneville Ave., Suite 250 Las Vegas, NV 89101 Jeremy_baron@fd.org ECF_NVNCH@fd.org /s/ R. Carreau An employee of the Office of the Attorney General